Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

OMNI INNOVATIONS, LLC, a Washington Limited Liability company, Plaintiff, v. INSURANCE ONLY, INC.; MICHAEL WEDEKING, and his marital community; PATRICK WEDEKING, and his marital community, Defendants.	NO. CV06-1210TSZ **DEFENDANTS' ANSWER TO COMPLAINT**

COME NOW defendants and for answer to plaintiff's Complaint, admit, deny and allege as follows:

Answering Paragraph 1 of the Complaint, defendants admit the allegations contained therein.

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Answering Paragraph 2 of the Complaint, defendants deny the allegations contained therein.

Answering Paragraph 3 of the Complaint, defendants admit that Michael Wedeking and Patrick Wedeking are shareholders of Insurance Only, Inc., and manage the day-to-day operations of the business. Defendants further admit that Insurance Only has transacted business in the State of Washington. All remaining allegations are denied.

Answering Paragraph 4 of the Complaint, defendants deny the allegations contained therein.

Answering Paragraph 5 of the Complaint, defendants deny the allegations contained therein.

Answering Paragraph 6 of the Complaint, defendants deny the allegations contained therein.

Answering Paragraph 7 of the Complaint, defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted therein, and therefore deny the same.

Answering Paragraph 8 of the Complaint, defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted therein, and therefore deny the same.

Answering Paragraph 9 of the Complaint, defendants deny the allegations

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contained therein.

Answering Paragraph 10 of the Complaint, defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted therein, and therefore deny the same.

Answering Paragraph 11 of the Complaint, defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted therein, and therefore deny the same.

Answering Paragraph 12 of the Complaint, defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted therein, and therefore deny the same.

Answering Paragraph 13 of the Complaint, defendants are without knowledge or information sufficient to form a belief as to the truth of the matters asserted therein, and therefore deny the same.

Answering Paragraph 14 of the Complaint, defendants deny the allegations contained therein.

Answering Paragraph 15 of the Complaint, defendants deny the allegations contained therein.

Answering Paragraph 16 of the Complaint, defendants deny the allegations

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contained therein.

Answering Paragraph 17 of the Complaint, defendants deny the allegations contained therein.

Answering Paragraph 18 of the Complaint, defendants deny the allegations contained therein.

Answering Paragraph 19 of the Complaint, defendants deny the allegations contained therein.

AFFIRMATIVE DEFENSES

By way of further answer to plaintiff's Complaint, defendants assert the following affirmative defenses:

1. Lack of subject matter jurisdiction;
2. Lack of personal jurisdiction over defendants Wedeking;
3. Improper venue;
4. Failure to mitigate damages; and
5. Violation of Federal Rule Civil Procedure 11.

PRAYER FOR RELIEF

WHEREFORE, having fully answered plaintiff's Complaint, defendants pray for relief as follows:

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1. For dismissal with prejudice of plaintiff's Complaint herein;

2. For their costs and attorney fees incurred in this matter as allowed under any applicable law; and

3. For such other and further relief as the Court deems just and equitable.

DATED this 6th day of July, 2007.

RETTIG OSBORNE FORGETTE, LLP

By /S/ Cheryl R.G. Adamson
CHERYL R.G. ADAMSON,
WSBA #19799
Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on July 6, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Robert J. Siegel, and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants: N/A.

s/ Cheryl R.G. Adamson / WSBA #19799
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